

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 15 B 35195
Richard V Brown)	HON. A. BENJAMIN GOLDGAR
)	CHAPTER 13
DEBTOR.)	

NOTICE OF MOTION

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on January 15, 2019, at 9:30 A.M., in courtroom 642 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604, I shall appear before the HONORABLE A. Benjamin Goldgar or before any judge sitting in his place and stead and shall then and there present the attached Motion at which place and time you may appear if you see fit.

PROOF OF SERVICE

The undersigned, an attorney, certifies that she transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on December 7, 2018.

/s/ Brenda Likavec
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625

Label Matrix for local noticing
0752-1
Case 15-35195
Northern District of Illinois
Chicago
Fri Dec 7 08:31:27 CST 2018

Sabre Investment LLC
Tannen Law Group PC
19 S. LaSalle Street
Suite 1600
Chicago, IL 60603-1407

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Avant Inc
640 N Lasalle St
Chicago, IL 60654-3731

AvantCredit
640 N. LaSalle Dr. Ste. 535
Chicago, IL 60654-3731

Brother Loan Finance
c/o Gary A Smiley
4741 N. Western
Chicago, IL 60625-2012

Brother Loan and Finance Company
c/o Gary A. Smiley, Attorney
P.O. Box 27
Skokie, IL 60076-0027

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

City Of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste 600
Chicago, IL 60604-3517

City of Chicago Parking Tickets
333 South State Street Rm 540
Chicago, IL 60604-3951

Comcast
1255 W. North Ave
Chicago, IL 60642-1562

ER Solutions/Convergent Outsourcing, INC
Po Box 9004
Renton, WA 98057-9004

First National Bank
Attn: FNN Legal Dept
1620 Dodge St., Stop Code 3290
Omaha, NE 68197-0002

First Premier Bank
Po Box 5524
Sioux Falls, SD 57117-5524

(p)ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY DEPARTMENT
P O BOX 64338
CHICAGO IL 60664-0338

Illinois Department of Revenue
Bankruptcy Section
P.O. Box 64338
Chicago, Illinois 60664-0291

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

(p)CONTINENTAL FINANCE COMPANY LLC
PO BOX 8099
NEWARK DE 19714-8099

Med Business Bureau
Po Box 1219
Park Ridge, IL 60068-7219

PEOPLES GAS LIGHT & COKE COMPANY
200 EAST RANDOLPH STREET
CHICAGO, ILLINOIS 60601-6433

Peoples Gas
Attention: Bankruptcy Department
130 E. Randolph 17th Floor
Chicago, IL 60601-6207

Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-9617
Orig By: Premier Bankcard Mc 56302-7999

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Sabre Group, LLC
PO Box 30074
Carbondale, IL 62902

Sabre Investments LLC
120 W. Madison St.
Suite 918
Chicago, IL 60602-4157

Webbank/fingerhut
6250 Ridgewood Roa
Saint Cloud, MN 56303-0820

Margaret M Molloy
The Semrad Law Firm, LLC
11101 S. Western Ave
Chicago, IL 60643-3907

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Patrick Semrad
The Semrad Law Firm, LLC
20 S. Clark St, 28th Floor
Chicago, IL 60603-1811

Patrick S. Layno
Office of the U.S. Trustee, Region II
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Richard V Brown
8044 S. Wabash
Chicago, IL 60619-3517

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Illinois Department of Revenue
Bankruptcy Section
Level 7-425, 100 W. Randolph St.
Chicago, IL 60601

Jefferson Capital Systems LLC
Purchased From Avant, Inc
Po Box 7999
Saint Cloud Mn 56302-9617
Orig By: Avantcredit

Mabt/contfin
121 Continental Dr Ste 1
Newark, DE 19713

End of Label Matrix
Mailable recipients 32
Bypassed recipients 0
Total 32

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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MOTION TO MODIFY PLAN

NOW COMES the Debtor, Richard V Brown by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtor states the following:

1. On October 16, 2015, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On February 16, 2016, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 1% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$1,270.00 monthly for 36 months.
5. Debtor fell behind on payments because he was seriously ill due to health issues. Debtor is disabled and had necessary medical expenditures and transportation costs related to those expenditures as he is not able to drive. As a result, accrued a default with the Chapter 13 plan payments. Please see Exhibit A.
6. Debtor's health has stabilized and can continue to make plan payments going forward.
7. Debtor respectfully requests this Honorable Court to defer the current default.

8. Debtor further requests this Honorable Court to increase the plan payments to \$1,670.00 per month to allow the case to complete within 60 months after filing.
9. Debtor is in a position to proceed with the instant case.
10. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order to defer the current default;
- B. That this Honorable Court increases the plan payment to \$1,670.00 per month; and
- C. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Brenda Likavec
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625